

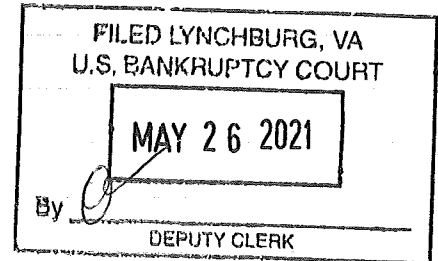
James & Heather Spurgeon
1389 S. Harriet St.

Martinsville, In 46151

Mr. Spurgeon@hotmail.com

765-341-4393

Clerk of the Court
United States Bankruptcy Court
1101 Court St, Room 1116
Lynchburg, Va 24504
May 23, 2021



Dear Honorable Rebecca B. Connelly,

I am writing you in reference to Case 20-60860-RBC, Service Dogs by Warren Retrievers, Inc. and the Global Resolution Motions that will be before you on June 3, 2021.

I Very Strongly object to "The Marianne Settlement Motion."

Marianne Warren was complicit in the acts of Charles D. Warren and helped further his actions by giving him money to fund his lavish lifestyle. During his first deposition in this case to Mr. Scott, he stated, under oath, that he did not have a mortgage on the Bordeaux Farms, LLC property as he had "very generous parents." This statement is supported by the fact that during the Bordeaux Farm, LLC restructuring filed 7/24/19, Case 19-60607, no bank was listed as a Secured Creditor. How could Mr. Warren pay off an almost \$650,000 mortgage between 2011-2019 when, according to the SDWR tax statement, he was making slightly more than \$100,000 per year?

Our family spent two years advocating, fundraising our full pledge amount of \$25,000, and waiting to receive our son's diabetic alert service dog, only to never even get his dog (should have received it March 2020). Hundreds of other families are in the same or similar situation as ours: They paid money to Service Dogs by Warren Retrievers, Inc. (SDWR) to improve their or their child's quality of life. Every family has been negatively affected by Warren's behavior. Each family may have:

(1) received a dog from SDWR that is not suitable as a Service dog, as they were contractually obligated to do if the family fundraised the money in full, (2) fundraised part of the money for a Service dog and received no dog and none of their money back, (3) received a dog but did not receive the training and the lifetime health guarantee as SDWR was contractually obligated provide, or (4) a family did not receive a dog as SDWR was, by contract, obligated to do even though they met the fundraising goal.

Marianne Warren is not a bank or a Secured Creditor. She willfully gave money to her son. If she was not listed as a Secured Creditor during the Bordeaux Farm, LLC bankruptcy filing, then how has her status changed in this bankruptcy case?

Because of these reasons, I believe that Marianne Warren should not be allowed to have any of the proceeds of the sale of the property. Therefore, again, I strongly object to the "The Marianne Settlement Motion."

Thank You,

Heather Spurgeon
Heather Spurgeon

cc: Hirschler Fleischer, PC